

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

In re:

Chapter 11

**ABERDEEN ENTERPRISES, INC.
BRICKCHURCH ENTERPRISES, INC.**

Case No. 23-72834-AST

Case No. 22-70914-AST

Debtors.

Jointly Administered

**NOTICE OF FILING OF SCHEDULE A TO BAY POINT CAPITAL PARTNERS II,
LP'S AND THE DEBTORS' SECOND AMENDED JOINT LIQUIDATING PLAN
UNDER CHAPTER 11 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE OF THE FOLLOWING:

Bay Point Capital Partners II, LP has filed the attached document as Schedule A to *Bay Point Capital Partners II, LP's and the Debtors' Second Amended Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* [D.I. 215] (the "Second Amended Joint Plan"). Schedule A was inadvertently left off the Second Amended Joint Plan when the Second Amended Joint Plan was originally filed.

Dated: February 20, 2024

Respectfully submitted,

THOMPSON HINE LLP

/s/ John C. Allerding

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Counsel for Bay Point Capital Partners II, LP

Schedule A**(to Bay Point Capital Partners II, LP's and the Debtors' Second Amended Joint
Liquidating Plan Under Chapter 11 of the Bankruptcy Code)**

	Brickchurch (366 Gin Lane)	Aberdeen (376 Gin Lane)
Sale Price + Buyer's Premium	\$43,345,280.00	\$45,661,440.00
Listing Broker Fee Reserve	\$192,500.00	\$202,500.00
Buyer's Broker Fee Reserve	\$385,000.00	\$405,000.00
Auctioneer Fee Reserve	\$770,000.00	\$810,000.00
Auctioneer Expenses Reserve	\$46,681.60	\$46,681.60
State of New York (Secured Debt)	\$1,997.79	\$168.20
Bay Point (Morgan Stanley Debt)		\$16,248,932.00
Bay Point (JGB Debt)	\$29,444,734.72	\$26,892,813.08
Bay Point (DIP Debt)	\$11,451,967.17	
US Trustee	\$250,000.00	\$250,000.00
Escrow Agent Reserve	\$25,000.00	\$25,000.00
IRS Administrative Expense Claim	\$425,000.00	\$575,000.00
State of New York Administrative Expense Claims	\$154.52	\$6.87
Duane Morris Administrative Expense Claim	\$151,905.95	
Simmons Legal Reserve	\$135,000.00	
Goldberg Weprin Finkel Goldstein LLP Reserve		\$140,000.00
Mathew Kabatoff Fee Reserve	\$30,000.00	\$30,000.00
Accountant Fee Reserve	\$10,000.00	\$10,000.00
Law Offices of Avrum Rosen, PLLC Reserve	\$25,338.25	\$25,338.25
	\$43,345,280.00	\$45,661,440.00